EXHIBIT 7

Case 3:17-cv-00939-WHA Document 2282-8 Filed 11/27/17 Page 2 of 5 HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

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1
                  UNITED STATES DISTRICT COURT
 2.
                NORTHERN DISTRICT OF CALIFORNIA
 3
                     SAN FRANCISCO DIVISION
 4
 5
 6
     WAYMO LLC,
 7
                    Plaintiff,
 8
                                          ) Case No.
        vs.
     UBER TECHNOLOGIES, INC.;
                                         ) 17-cv-00939-WHA
 9
10
     OTTOMOTTO, LLC; OTTO TRUCKING LLC, )
11
                   Defendants.
                                          )
12
      HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY
13
14
15
        VIDEOTAPED DEPOSITION OF ANGELA L. PADILLA, ESQ.
16
                    San Francisco, California
17
                      Monday, October, 2017
18
                            Volume I
19
20
     Reported by:
     MARY J. GOFF
21
22
     CSR No. 13427
23
     JOB No. 2716665
24
     PAGES 1-111
25
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Case 3:17-cv-00939-WHA Document 2282-8 Filed 11/27/17 Page 3 of 5 HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

1	subject?	10:34:28
2	A Truly, I do not.	10:34:29
3	Q So you can't testify as to what sources	10:34:45
4	within Uber were searched or not searched in to	10:34:47
5	comply with the court's order; is that right?	10:34:55
6	A I don't know if that impinges on privilege	10:35:03
7	or not.	10:35:05
8	Q Okay. What sources did Uber search within	10:35:05
9	Uber to comply with the court's order?	10:35:11
10	A As far as I recall, everywhere. Meaning	10:35:16
11	we took this order very, very seriously and put a	10:35:21
12	ton of people power on the direction here in	10:35:28
13	paragraph 4.	10:35:34
14	And I believe we also retained outside	10:35:36
15	experts to help us and moved heaven and earth to	10:35:38
16	look under every rock and understand the answer to	10:35:46
17	paragraph 4.	10:35:50
18	Q Okay. So who did who did you retain?	10:35:53
19	A I don't recall the name of the forensic	10:35:59
20	expert that was retained.	10:36:01
21	Q Do you recall the the entity?	10:36:02
22	A Hum-um. I don't. I'm sorry.	10:36:04
23	Q Do you know what specifically that entity	10:36:06
24	did to search within Uber?	10:36:10
25	A I'm sure sorry. Is your question done?	10:36:16
		Page 45

Case 3:17-cv-00939-WHA Document 2282-8 Filed 11/27/17 Page 4 of 5 HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

1	to mind right now.	10:38:15
2	Q (BY MR. PERLSON) Okay.	10:38:16
3	A And speak to the individuals named here,	10:38:17
4	Anthony, Sameer, Radu.	10:38:19
5	The idea was to to leave no stone	10:38:24
6	unturned. The idea was scorched-earth approach.	10:38:26
7	Q But you didn't search everywhere Uber	10:38:34
8	didn't search everywhere within let me start over	10:38:37
9	again.	10:38:41
10	Uber did not search every electronic	10:38:42
11	source of data within Uber in response to the	10:38:44
12	court's March 16 order? Would you agree with that?	10:38:53
13	A I don't have a basis to agree or not	10:38:59
14	agree. I'm sure that what we searched was based on	10:39:01
15	identifying the most likely places where any of this	10:39:06
16	information would would be found, if it was there	10:39:13
17	at all.	10:39:16
18	Q Okay. What areas were searched	10:39:17
19	specifically?	10:39:19
20	A For that, you would have to ask others on	10:39:20
21	the team or outside counsel and the vendor that	10:39:22
22	helped us.	10:39:26
23	Q Okay. You don't you don't know that	10:39:28
24	you don't have any personal knowledge of that	10:39:30
25	yourself?	10:39:32
		Page 47

Case 3:17-cv-00939-WHA Document 2282-8 Filed 11/27/17 Page 5 of 5 HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

1	A I really don't.	10:39:33
2	Q Okay. And so you don't know specifically	10:39:33
3	what outside counsel did in terms of trying to	10:39:37
4	obtain obtain any information responsive to	10:39:44
5	paragraph 4 of the March 16 order; is that fair?	10:39:48
6	A I mean, that's fair to say. I know in	10:39:52
7	general how one would search for this kind of	10:39:54
8	information, but I don't know specifically what they	10:39:57
9	did.	10:40:01
10	Q Okay. And as to the in-house counsel that	10:40:01
11	was tasked to assist with Uber's response to	10:40:08
12	paragraph 4 of the court's March 16 order, you don't	10:40:12
13	know specifically what what they did; is that	10:40:16
14	fair?	10:40:20
15	A I know they spent a ton of time over at	10:40:20
16	Otto in trying to find any of this information, if	10:40:24
17	any of it existed, and interviewing people and	10:40:28
18	reviewing forensic material that had been acquired.	10:40:33
19	But but in terms of telling you detail	10:40:37
20	by detail, no, I can't do that.	10:40:39
21	Q Okay. And and how did you know that	10:40:42
22	the that your in-house team was was doing	10:40:43
23	investigations or talking to people at Ottomotto?	10:40:52
24	A I was told so.	10:40:56
25	Q Okay. By your in-house	10:40:57
		Page 48